

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
1285 AVENUE OF THE AMERICAS
TELEPHONE (212) 373-3000

NEW YORK, NEW YORK 10019-6064

UNIT 5201, FORTUNE FINANCIAL CENTER
5 DONGSANHUAN ZHONGLU
CHAOYANG DISTRICT, BEIJING 100020, CHINA
TELEPHONE (86-10) 5828-6300

WRITER'S DIRECT DIAL NUMBER

(212) 373-3553

WRITER'S DIRECT FACSIMILE

(212) 492-0553

WRITER'S DIRECT E-MAIL ADDRESS

sbuergel@paulweiss.com

HONG KONG CLUB BUILDING, 12TH FLOOR
3A CHATER ROAD, CENTRAL
HONG KONG
TELEPHONE (852) 2846-0300

ALDER CASTLE
10 NOBLE STREET
LONDON EC2V 7JU, UNITED KINGDOM
TELEPHONE (44 20) 7367 1600

FUKOKU SEIMEI BUILDING
2-2 UCHISAIWAICHO 2-CHOME
CHIYODA-KU, TOKYO 100-0011, JAPAN
TELEPHONE (81-3) 3597-8101

TORONTO-DOMINION CENTRE
77 KING STREET WEST, SUITE 3100
PO BOX 226
TORONTO, ONTARIO M5K 1J3
TELEPHONE (416) 504-0520

2001 K STREET, NW
WASHINGTON, DC 20006-1047
TELEPHONE (202) 223-7300

500 DELAWARE AVENUE, SUITE 200
POST OFFICE BOX 32
WILMINGTON, DE 19899-0032
TELEPHONE (302) 655-4410

Via ECF

The Honorable Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street, Room 2260
New York, NY 10007

Cardwell v. Davis Polk & Wardwell LLP, et al.
19-cv-10256-GHW (S.D.N.Y.)

Dear Judge Woods:

We represent Davis Polk & Wardwell LLP and the remaining individual defendants, and write in response to this Court's February 16, 2023 scheduling order (Dkt. No. 306), jointly with counsel for plaintiff Kaloma Cardwell.

Defendants anticipate that a trial of the remaining claims in this matter will last **two weeks**. In September, October, November, and December 2023, defendants are **unavailable for a trial** during the following date ranges:

- September 25-October 20;
- November 8-17;
- December 1-8.

Plaintiff anticipates that a trial of the remaining claims in this matter will last **four weeks**. In September, October, November, and December 2023, plaintiff is **unavailable for a trial** during the following date ranges:

- September 7-10 and 18-24
- October 30-November 4;

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- November 20-24
- December 18-29

In light of an anticipated trial and the timeframes under consideration, the parties respectfully request an extension, *sine die*, of the pre-trial submission deadlines set forth in your Honor's Individual Rules of Practice 5(A-C), until a trial schedule is set.

Respectfully,

/s/ Susanna M. Buergel

Susanna M. Buergel

cc: All Counsel of Record (via ECF)